

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	CRIMINAL ACTION
v.	)	
	)	NO. 04-10299-PBS
7. VALENTIN MARTINEZ	)	
	)	
23. LUIS DEJESUS	)	
	)	

JOINT MOTION TO CONTINUE TRIAL DATE UNTIL JULY 10, 2006

The United States and the defendants VALENTIN MARTINEZ, by and through his counsel William Keefe, and LUIS DEJESUS, by and through his counsel John Laymon, respectfully moves this Court for a continuance of the February 27, 2006 trial date until July 10, 2006. In support, the parties submit that both defendants MARTINEZ and DEJESUS intend to enter pleas of guilty but additional time is needed to finalize plea agreements with the government.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

/s/ Neil J. Gallagher, Jr.  
Neil J. Gallagher, Jr.  
Sandra Bower  
Assistant U.S. Attorneys  
One Courthouse Way  
Boston, MA

Date: February 16, 2006

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and mailed to all those not participating in ECF.

/s/ Neil J. Gallagher, Jr.  
Neil J. Gallagher, Jr.